1	SCOTT N. SCHOOLS (SCBN 9990) United States Attorney	
2	MARK L. KROTOSKI (CSBN 138549) Chief, Criminal Division RICHARD J. CUTLER (CSBN 146180) Assistant United States Attorney 450 Golden Gate Avenue San Francisco, California 94102 Telephone: (415) 436-6867 Email: richard.cutler@usdoj.gov	
4		
56		
7		
8	Attorneys for Plaintiff	
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA,	Criminal No. CR 07-00004 CRB
13	Plaintiff,	
14 15) STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME
16	V.)))
17	ULISES CASTELLANOS-CISNEROS,	
18	JERONIMO MADRIZ-REYNA,))
19		
20	Defendants.))
21)
22	The above-captioned matter came before the Court on February 14, 2007, for a status	
23	hearing. Both defendants, Ulises Castellanos-Cisneros, and Jeronimo Madriz-Reyna were	
24	present and were represented by their attorneys, Arturo Hernandez-M, Esq., and Jesse J. Garcia,	
25	Esq., respectively, and the government was represented by Richard J. Cutler, Assistant United	
26	States Attorney. Mr. Garcia was making his first appearance for defendant Madriz-Reyna	
27	having substituted into the case as counsel. Pursuant to a request from both defendants for time	

to prepare and file motions and to further investigate the case, as well as a separate request from

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME CR 07-00004 CRB

28

Mr. Garcia for time to familiarize himself with the case and then file motions, the Court set a the date for hearing on motions for April 25, 2007 at 2:15 p.m. The Court made a finding on the record that the time between February 14, 2007, and April 25, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h), because the ends of justice served by taking such action outweighed the best interest of the public and the defendants in a speedy trial. That finding was based on the Court's finding of the defendants' needs to effectively investigate and prepare the matter, taking into account the exercise of due diligence, as well as the need for substitution of counsel and for preparation and filing, and then decision on pretrial motions. That finding was made pursuant to 18 U.S.C. \S 3161(h)(1)(F), (h)(8)(A), and (h)(8)(B)(iv). The parties hereby agree to and request that the case be continued until April 25, 2007, at

2:15 p.m. for hearing on motions and that an exclusion of time until that date be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, Section §§ 3161(h)(1)(F), (h)(8)(A), and (h)(8)(B)(iv), because the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial.

DATED: 2/14/07 16

ARTURO HERNANDEZ-M Counsel for DEFENDANT ULISES CASTELLANOS-CISNEROS

19 DATED:

2/14/07

JESSIE J. GARCIA Counsel for DEFENDANT JERONIMO MADRIZ-REYNA

Assistant United States Attorney

RICHARD J. CUTLER

20

21 22

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

17

18

DATED: 2/14/07

23 24

SO ORDERED. 25

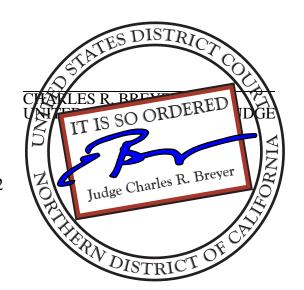
26

27

DATED: February 26, 2007

28

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME CR 07-00004 CRB



2